



**Department of
Consumer Affairs**

**Statement of Andrew Eiler
Director of Legislative Affairs
Department of Consumer Affairs
before the
City Council Committee on
Consumer Affairs
on
Intro 708-A
April 21, 2009**

Good morning, Chairman Comrie and Committee members. I am Andrew Eiler, Director of Legislative Affairs for the Department of Consumer Affairs. Commissioner Mintz asked me to thank you for the opportunity to appear before you to express our opposition to Intro 708-A, a bill that would strip away substantial and critical protections for consumers faced with nonconsensual tows and, at the same time, significantly increase the fees which towing companies could impose.

Simply put, this bill repeals a host of consumer protections in the law, including price gouging. This bill then also proposes substantial increases in fees towing companies could impose on consumers, most particularly and egregiously when assessed for tows that are not made with the consent of the consumer.

By far, the single biggest concern expressed by individual New Yorkers and community groups as it relates to towing revolves around unauthorized and aggressive towing from commercial parking lots. Yet, rather than tighten regulations to address these widespread concerns, this bill actually seeks to eliminate existing protections.

This bill also zeroes in on, but then unfortunately seeks to strip away, the critical consumer protections regarding fees New Yorkers can be charged when their cars get towed away from accidents. By essentially deregulating the carefully crafted rate guidelines in the current law, the bill essentially asks the consumer who himself or herself may be injured and whose car is damaged in an accident, to give a blank check to the towing company that swoops in to grab that car from the accident scene.

The bill seeks a substantial 157% increase in rotation tow program rates towers would be allowed to charge, and also calls for a 67% increase in storage fees at a yard to which a consumer's car is involuntarily brought. The bill also gives free reign to towing companies to add on extra fees at will; one might just begin to imagine fees being added for, among other things, moving the car, safekeeping personal property in a car, viewing fees to allow appraisers to examine damaged vehicles, and transfer fees to allow another tower to pick up a damaged vehicle to be repaired elsewhere.

We call upon the Committee to reject this bill. Thank you for the opportunity to testify and I would be happy to answer any questions you may have at this time.

Testimony of the Empire State Towing and Recovery Association
Before the
Consumer Affairs Committee of the New York City Council
On the Subject of Intro No. 708-A

Submitted by:

Peter B. O'Connell
Counsel to the Empire State
Towing and Recovery Association

April 21, 2009

My name is Peter O'Connell and I am counsel to the Empire State Towing and Recovery Association, ("ESTRA") a statewide association of tow truck operators, many of whom participate in non-consensual towing programs in New York City. I am also counsel to the Towing and Recovery Association of America ("TRAA"), the national trade association for the towing and recovery industry and the Conference of Northeastern Towing Associations ("CNTA"), a conference of towing associations from the states of Maine, New Hampshire, Vermont, Massachusetts, Connecticut, Rhode Island, New York, New Jersey, Pennsylvania and Maryland.

I appreciate this opportunity to address this committee on Intro No.708-A, which is crucial to the survival of towing companies that participate in the various non-consensual towing programs in New York City. Existing rates for non-consensual tows are as follows:

- (1) Towing from Private Property (§19-169.1 (a) of the NYC Administrative Code): No more than \$100.00 for towing and the first three days of storage and not more than \$10.00 per day for storage thereafter;
- (2) Arterial Highways (§20-509.1 of the Admin Code): \$70.00 for the first mile or fraction thereof and \$4.00 for each additional mile or fraction thereof. Storage rates are \$10.00 per day for the first three days of storage and \$15.00 for each day thereafter.

- (3) Directed Accident Response (DARP) Program (§20-518 (b) (4) and (5) of the Admin Code): \$80.00 for towing and the first day of storage, \$15.00 per day for the next three days and \$17.00 per day thereafter
- (4) Rotation Tow (ROTOW) Program (§20-518 (c) (1) of the Admin Code: \$70.00 for towing and the first day of storage, \$15.00 per day for the next three days and \$17.00 per day thereafter..

This bill seeks to combine these three rates into a uniform rate of \$185.00, except that an additional charge of \$4.00 per mile may be charged if the owner or operator of the vehicle requests that it be towed to a location other than the tower's place of business. Storage rates are increased from \$15.00 to \$25.00 for the first three days of storage and from \$17.00 to \$35.00 for each day thereafter.

These are, admittedly, substantial increases in rates. However, it should be noted that the existing rates do not meet standards imposed by Congress when it enacted the ICC Termination Act of 1995, i.e.; that rates for non-consensual tows be "compensatory and reasonable." The existing rates not only fail to meet these standards; they are confiscatory.

The requested rate of \$185.00 was not arrived at by accident. It is identical to rates that are authorized by City Marshalls and Sheriffs and the Department of Finance under its SCOFFTOW program. NYPD also charges \$185.00 for tows (mostly parking violations) that it performs with its tow trucks. There is no justification to charge a lesser

rate for other types of non-consensual tows – particularly when Arterial Highway and DARP tows are far more dangerous and technically challenging than those tows that are performed at the higher rates.

The proposed increases are also in keeping with rates that are authorized in many other major metropolitan areas. To the best of my knowledge, the City of San Francisco authorizes the highest rates in the country at \$220.00 per tow. This is followed by Dallas, Texas, at \$212.00; Oakland, California, at \$180.00; and Sacramento, California, at \$165.00. Chicago¹, Baltimore² and Philadelphia all authorize rates of \$150.00 per tow.

Nor are the City's rates competitive with those that are authorized in many neighboring municipalities. For example, the towns of Hempstead and North Hempstead authorize hook-up charges of \$90.00, plus \$5.00 per mile, which brings the average tow up to approximately \$140.00³. The rate in the Town of Smithtown is \$125.00 plus \$6.00 per mile, which brings an average tow up to approximately \$185.00.

Most upstate rotation programs that are maintained by the State Police and Sheriff departments do not set rates. Rather, they allow towers to submit their customary and usual rates and reserve the right to reject them if they are deemed to be excessive. Typically, these rates range from \$100.00 to \$125.00 for tow trucks and from \$125.00 to

¹ This is a "relocation" fee for DWI tows. Accident tows, which are performed pursuant to contracts, are higher.

² There is a proposal under consideration to increase this rate to \$175.00

³ These rates include \$15.00 fuel surcharges. The Town of Hempstead is currently considering a proposal to increase its rate to \$125.00 plus \$6.00 per mile

\$150.00 for flatbeds. Additional allowances for responding to accident scenes often bring these rates up to over \$200.00..

Upstate municipalities that regulate rates range from \$99.00 (Rochester), to \$100.00 for a tow truck and \$125.00 for a flatbed (Albany), to \$125 for a tow truck and \$140.00 for a flatbed (Cheektowaga) to \$150.00 (New Paltz). The Thruway Authority allows for \$64.50 for the first mile and \$4.50 for each mile thereafter. Because many of these tows are for twenty or more miles, the average tow is in the \$150.00 range.

There are additional factors that must be considered in determining the fairness of this rate increase. Significantly, the cost of doing business in New York City exceeds the cost of doing business in any of the venues described above, with the possible exception of San Francisco. Also, the condition of the City's streets and highways take a greater toll on equipment than do the streets and highways in most of these other venues.

More importantly, non-consensual rates in the City have not kept pace with costs for several years. The towing industry was in serious financial difficulty in 2001 as the result of an unreasonably low DARP rate of \$65.00 and ROTOW rate of \$50.00. The industry requested an increase to \$125.00, which would have provided much needed relief to participants in these programs. Rather than grant this request, the City Council approved a modest \$20.00 increase, which brought the rates up to the present levels of \$85.00 and \$70.00. Three years later, it approved an increase for arterial highway towers, which brought them up to their current levels.

These rates were insufficient in 2001 and 2004. Since then, the industry has experienced unprecedented increases in the cost of doing business (particularly in fuel and insurance) and a decline in revenues as a direct result of 9/11. Towing companies have been unable to make the investments in equipment and personnel that are needed to maintain the high level of services that are required under the arterial highway, DARP and ROTOW programs.

Had the City Council approved the industry's request to \$125.00 in 2001, a \$25.00 increase at this time would have kept pace with inflation. Unfortunately, far more is now needed in order to return the industry to a firm financial footing. The industry's rolling stock is among the worst in the entire country and it is losing qualified employees because it cannot afford to pay decent wages. The increase to \$185.00 that is sought under this bill is essential if we are to avert further declines to the industry and possibly promote unsafe conditions on our streets and highways.



Metropolitan

NY Towing, Auto Body & Salvage Association

2 52nd Street - Box B11 • Brooklyn, NY 11232-2602
(718) 492-6464 • Fax: (718) 492-4066 • E-mail: Towingassn@aol.com

APRIL 21, 2009

GOOD MORNING. MY NAME IS NORMAN TEITLER. I AM THE EXECUTIVE DIRECTOR OF THE METROPOLITAN NY TOWING, AUTO BODY & SALVAGE ASSOCIATION.

LET ME ADDRESS INTRO 708-A - INCREASING THE RATES THAT TOWING COMPANIES CAN CHARGE FOR THEIR SERVICES. METROPOLITAN LAST WEEK FORWARDED TO EACH COMMITTEE MEMBER A 28 PAGE BOOKLET ENTITLED "JUSTIFICATION FOR RATE INCREASE FOR ARTERIAL HIGHWAY, DARP, ILLEGALLY PARKED AND ROTOW PROGRAMS MILEAGE AND STORAGE RATES."

WHAT IS THE PRIVATE TOWING INDUSTRY OF NEW YORK? WE ARE CITIZENS OF THE CITY OF NEW YORK. WE ARE TAXPAYERS OF THE CITY OF NEW YORK. WE ARE VOTERS IN NEW YORK CITY. WE ARE EMPLOYERS AND BUSINESS OWNERS AND

EMERGENCY FIRST RESPONDERS WITHOUT WHOM THIS CITY COULD NOT FUNCTION.

THE TIME HAS COME AFTER MANY, MANY YEARS; AFTER TREMENDOUS INCREASES IN ALL THE OPERATING COSTS OF TOWING COMPANIES IN THIS CITY; FOR THE RATE INCREASES CALLED FOR IN THIS BILL TO BECOME LAW. METROPOLITAN AND ALL ITS MEMBERS ARE FULLY IN FAVOR OF A QUICK AND EARLY PASSAGE OF THIS PIECE OF LEGISLATION.

HOWEVER, CERTAIN CHANGES IN THE BILL ARE NECESSARY TO COMPLY WITH ALL ASPECTS OF THE ADMINISTRATIVE CODE. THE SPECIFIC CHANGES WERE FORWARDED TO CHAIRMAN COMRIE'S OFFICE LAST WEEK. THEY ARE:

(1) WE CANNOT ELIMINATE THE REQUIREMENT FOR A CONTRACT TO EXIST BETWEEN A TOWING COMPANY AND THE PROPERTY OWNER;

(2) THE SAME RATE INCREASE MUST ALSO APPLY TO SECTION 19-169 - THE REMOVAL OF VEHICLES FROM BLOCKED DRIVEWAYS;

(3) A DISTINCTION MUST BE INSERTED BETWEEN THE HOOK-UP OF A VEHICLE REGISTERED AT LESS

THAN 10,000 POUNDS AND THOSE VEHICLES REGISTERED AT MORE THAN 10,000 POUNDS;

(4) STORAGE CHARGES MUST BE SET "PER CALENDAR DAY" AND NOT PER 24 HOURS;

(5) A FEE FOR STORAGE MUST BE INCLUDED FOR PRIVATE PROPERTY TOW-AWAYS;

(6) THE INSERTION IN THE LAW OF A "LABOR CHARGE" WHICH CAN ONLY BE AUTHORIZED BY A POLICE OFFICIAL OR DOT OFFICIAL AT THE SCENE;

(7) NOW IS ALSO THE CORRECT TIME TO INCREASE THE COMMERCIAL TOWING RATES WHICH LIKEWISE HAVE NOT BEEN RAISED IN ALMOST TEN YEARS, SO THE COUNCIL DOES NOT HAVE TO REVISIT THIS ISSUE AGAIN.

BETWEEN THIS HEARING AND THE SECOND READING OF THE BILL I WILL WORK WITH THE CHAIRMAN AND COUNSEL FOR THIS COMMITTEE TO INSERT THE NEEDED CHANGES SO THAT THE ISSUE OF RATES CAN BE RESOLVED AT THIS TIME.

ONE SIGNIFICANT ISSUE MUST BE ADDRESSED. I ASK YOU DIRECTLY NOW, AS I DID IN A RECENT LETTER SENT TO EACH OF YOU, THAT A BILL BE INTRODUCED THAT ALLOWS THE 58,000 BUSINESSES LICENSED BY THE DEPARTMENT OF CONSUMER AFFAIRS THE RIGHT TO EITHER SELL

THEIR BUSINESS; TAKE IN A NEW PARTNER; OR SELL A PORTION OF THE SHARES IN THEIR BUSINESS TO A NEW INVESTOR SO THEY CAN EXPAND AND HIRE NEW EMPLOYEES, WITHOUT HAVING TO FORFEIT THEIR CURRENT LICENSE AND START ANEW. THIS BILL MUST BE INTRODUCED NOW SO IT CAN BE PASSED THIS YEAR.

IN CONCLUSION, I WANT TO PERSONALLY THANK EACH OF YOU FOR YOUR SUPPORT OF OUR INDUSTRY AND FOR VOTING FOR PASSAGE OF THIS LEGISLATION THAT IS SO URGENTLY NEEDED BY THE PRIVATE TOWING INDUSTRY OF NEW YORK CITY.

**STATEMENT OF AAA NEW YORK, INC.,
BEFORE THE NEW YORK CITY COUNCIL COMMITTEE ON
CONSUMER AFFAIRS, NEW YORK, NEW YORK
APRIL 21, 2009**

I am John A. Corlett, Director of Government Affairs for AAA New York, Inc., the local AAA affiliate which serves a membership of 1.5 million members in New York City and several adjacent counties of New York State. Beside me is John Africano, AAA New York's Director of Automotive Services.

Our organization opposes the proposed increases in non-consensual towing rates, as proposed by Intro 708-A, because we believe the increases are both unfair and unjustified, being far in excess of both regulated rates in neighboring jurisdictions and the prevailing on-street towing rates in the City of New York; and out of proportion to any cost increases providers may have experienced.

By way of background, The Federal Aviation Administration Authorization Act of 1994, with certain exceptions, preempts states and localities from regulating the price (rates), routes or service of motor carriers including tow trucks. Therefore, the city's jurisdiction to regulate towing rates is limited to towing of vehicles without

vehicle operators' authorization or consent (non-consensual towing). Non-consensual towing service in the City of New York includes vehicles towed on the city's arterial highway system (by city permittees), damaged vehicles involved in crashes towed by companies designated under the Directed Accident Response Program (DARP), and recovered stolen vehicles towed at the direction of the police department (ROTOW). Under this proposal the arterial towing rate, now \$70 for the hook-up and First Mile, would increase to \$185.

Simply put, AAA New York does not believe that a rate increase of 165%, to \$185, for the First Mile is justified. Our view is supported by a recent survey conducted by our automotive services department which indicates that the \$185 First Mile rate is far higher than the rate charged by surrounding municipalities. For example, Hempstead and North Hempstead both charge a First Mile rate of \$75. The Town of Oyster Bay has a slightly higher First Mile rate of \$95. The New York State Thruway's authorized contractors charge a hook-up rate of only \$60 plus \$4.50 for each additional mile.

On city arterials where lesser distances are traveled by "franchised" stations and where substantial volumes of traffic generate greater volumes of service calls, a market rationale would dictate fees far lower than those proposed by Intro 708-A. ✓

Further, as it seems likely to us that the fees charged by the city to franchised tow companies will increase, there is a danger that increased revenue for the city may become a higher priority than the protection of consumers unlucky enough to break down on a city franchised roadway, and we question whether the city should be profiting from a monopoly designed to safeguard drivers in distress.

Moreover, the timing of these increases could also not have come at a worse time for consumers. Current economic conditions have forced consumers to retain their vehicles for longer periods of time, causing some to forego vehicle maintenance, resulting in additional breakdowns, tows and repairs. The rates proposed in Intro. 708-A will now expose those unfortunate enough to break down to extraordinary fees for the recovery of their disabled vehicles.

It is also important to note that the prevailing non-regulated consensual towing rates on city streets are much lower – in the range of \$75 to \$90.

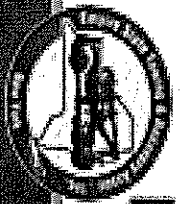
We appreciate that adequate rates are essential to the livelihood of the towing industry. However, it is important to note that when the tow law was first enacted, the Council determined that the purpose of regulating non-consensual towing rates was to shield consumers from exorbitant rates, not to participate in them.

In short, we believe that a 165% increase to \$185 for the First Mile is excessive and contrary to the city's consumer protection mission. Further, there has been no explanation of the basis for the 165% increase nor any attempt to justify the need for an increase of this magnitude.

Accordingly, we most strongly oppose the enactment of Intro 708-A.

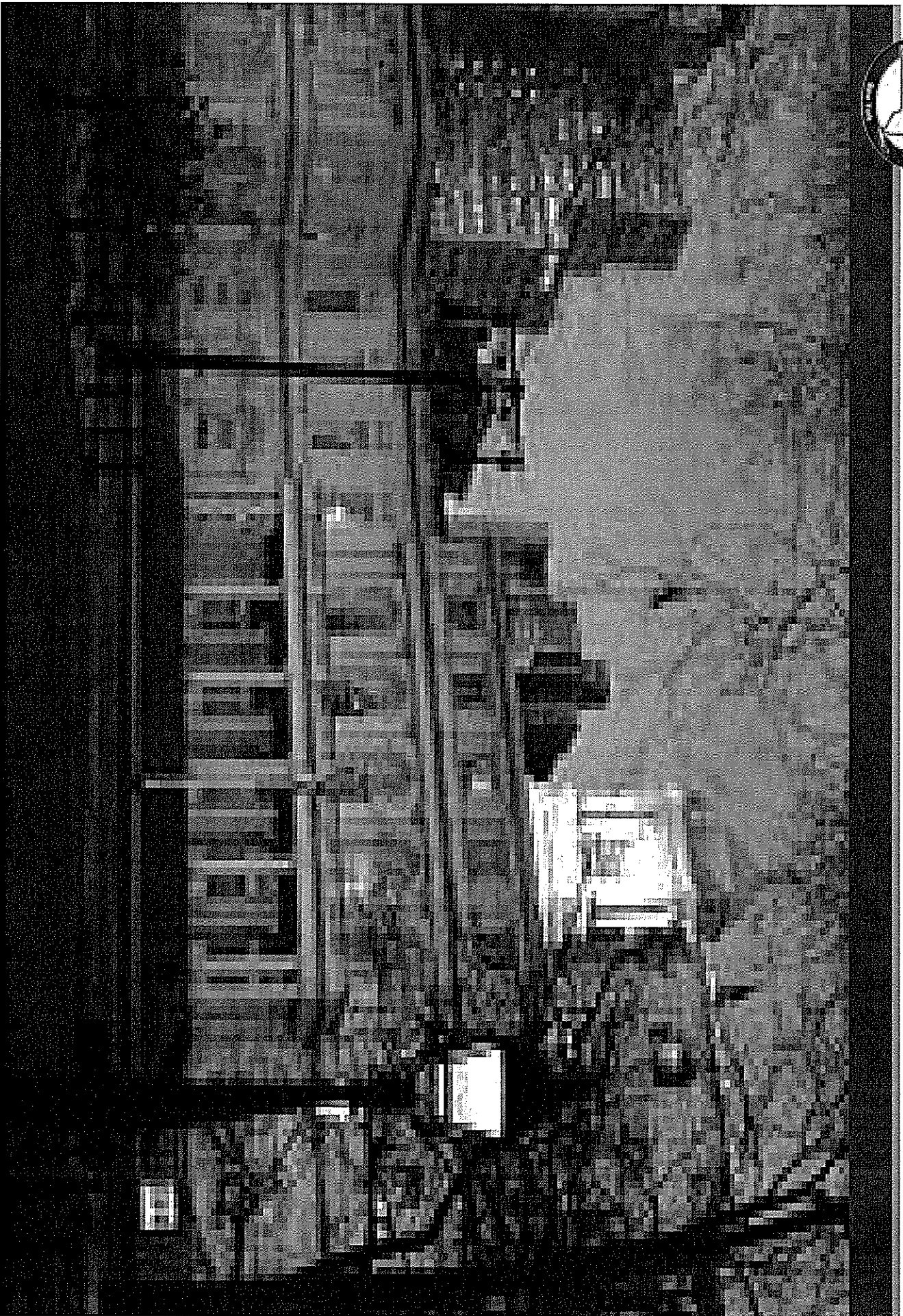
Thank you for the opportunity to comment.

(Statements/Statement of AAA NY Before the NYC Council On Consumer Affairs 4/09)



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1-888-85-ESTRA



Introduction of Association

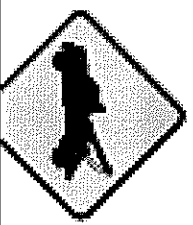
**Empire State Towing & Recovery Association
130 Washington Avenue, Albany, NY 12210
1-888-85-ESTRA**

- **ESTRA is a statewide professional organization, established by towers and for towers. Our association works hard to promote respect for the professional tower and to educate the general public and governmental agencies about the towing industry.**
- **With offices in New York's capital, ESTRA maintains a strong presence as an advocate for the towing industry and related businesses. ESTRA supports pro-towing state, local legislation or ordinances and opposing those regulatory measures that would be detrimental to the industry.**



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The ESTRA Scholarship program

- Since 1998, ESTRA's Tow Show Committee has been setting aside a portion of the tow show proceeds to fund an educational scholarship for those wishing to continue their education. Currently, the amount of the scholarship is \$500 per year for up to 4 years (total of \$2000), provided the recipient continues to meet the eligibility guidelines.

President: Jim Bache

Presenter

NYC Regional Vice President: Joseph K. Robles



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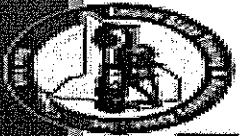


History Timeline of DARRP Rates

D.A.R.P. Rates

Direct Accident Response Program

- **1991** – From \$25 to \$50
- **1997** – From \$50 to \$65
- **2001** – From \$65 to \$80



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History Timeline of RoTow Rates

Rotation Tow Rates

Stolen recovered and determine true owner autos.

- **1997** — From \$25 to \$50
- **2001** — From \$50 to \$70



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History Timeline of Arterial Rates

Arterial Tow Rates

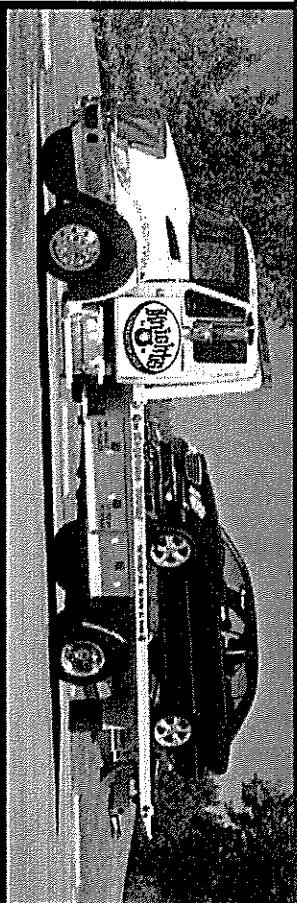
Restricted access arterial highways.

- **1995** – \$50 Hoist & Tow including 1st mile or fraction thereof and \$3.50 each additional mile or fraction thereof within NYC Limits
- **2004** – \$70 Hoist & Tow including 1st mile or fraction thereof and \$4.00 each additional mile or fraction thereof within NYC Limits



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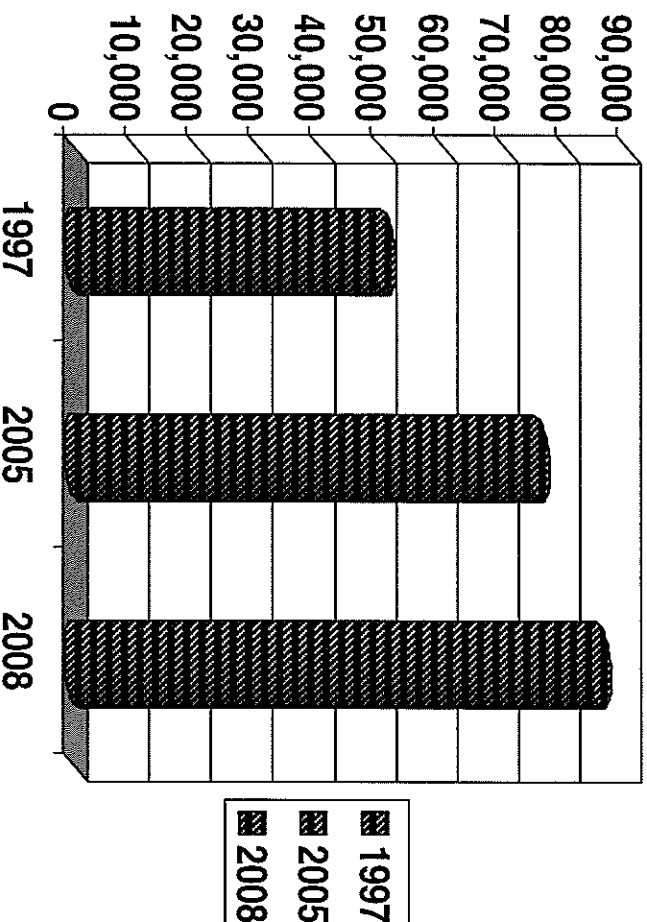
New York Towing Equipment Costs – Light Duty

Light Duty Flatbed:

1997	\$ 45,000 to \$ 50,000
2005	\$ 70,000 to \$ 75,000
2009	\$ 80,000 to \$ 85,000

Difference: Increase of 60%

* Source: Thomas Decillis of Tri-State Truck Sales

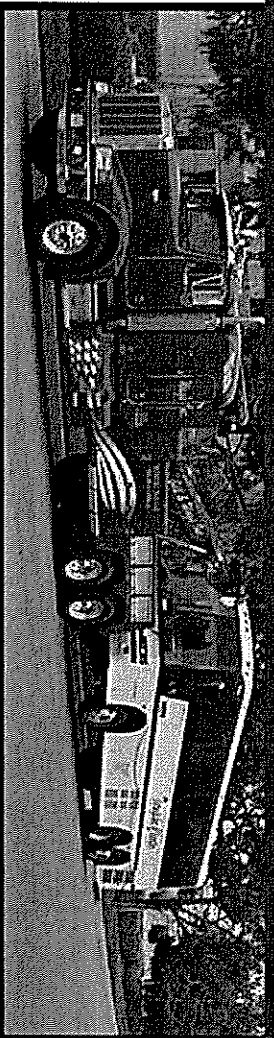




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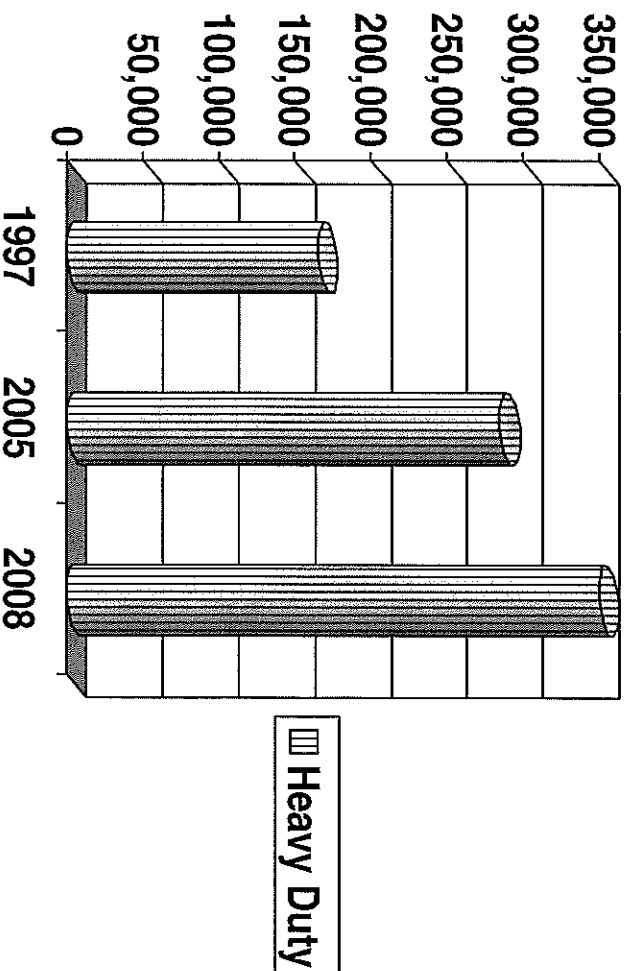


New York City Towing Equipment Costs – Heavy Duty

Heavy Duty Tow Truck:

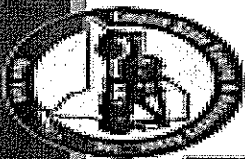
1997	\$ 160,000 to \$ 165,000
2005	\$ 275,000 to \$ 285,000
2009	\$ 305,000 to \$ 350,000

Difference: Increase of 112%



* Does not include Federal Excise Tax (FET)

* Source: Thomas Decillis of Tri-State Truck Sales



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Fuel Increase – East Coast

East Coast Average Fuel Prices:

1997	\$1.22 per gallon avg.
2003	\$1.64 per gallon avg.
2005	\$2.51 per gallon avg.
*2008	\$4.00 per gallon avg.

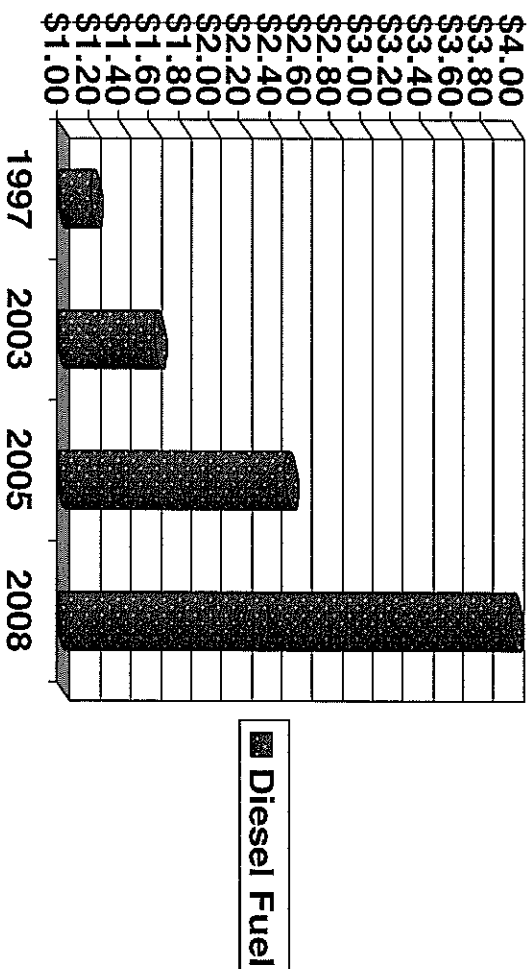
Difference: Increase of 210%

* April 2008

Source : <http://onto.eia.doe.gov/oog/info/gdu/gasdieselas.asp>

Currently the price of diesel has come down somewhat but is expected to rise above the April 2008 average going into 2010 and beyond. In addition the average price per gallon in the NYC area is always higher than the east coast average.

North East Average Fuel Prices





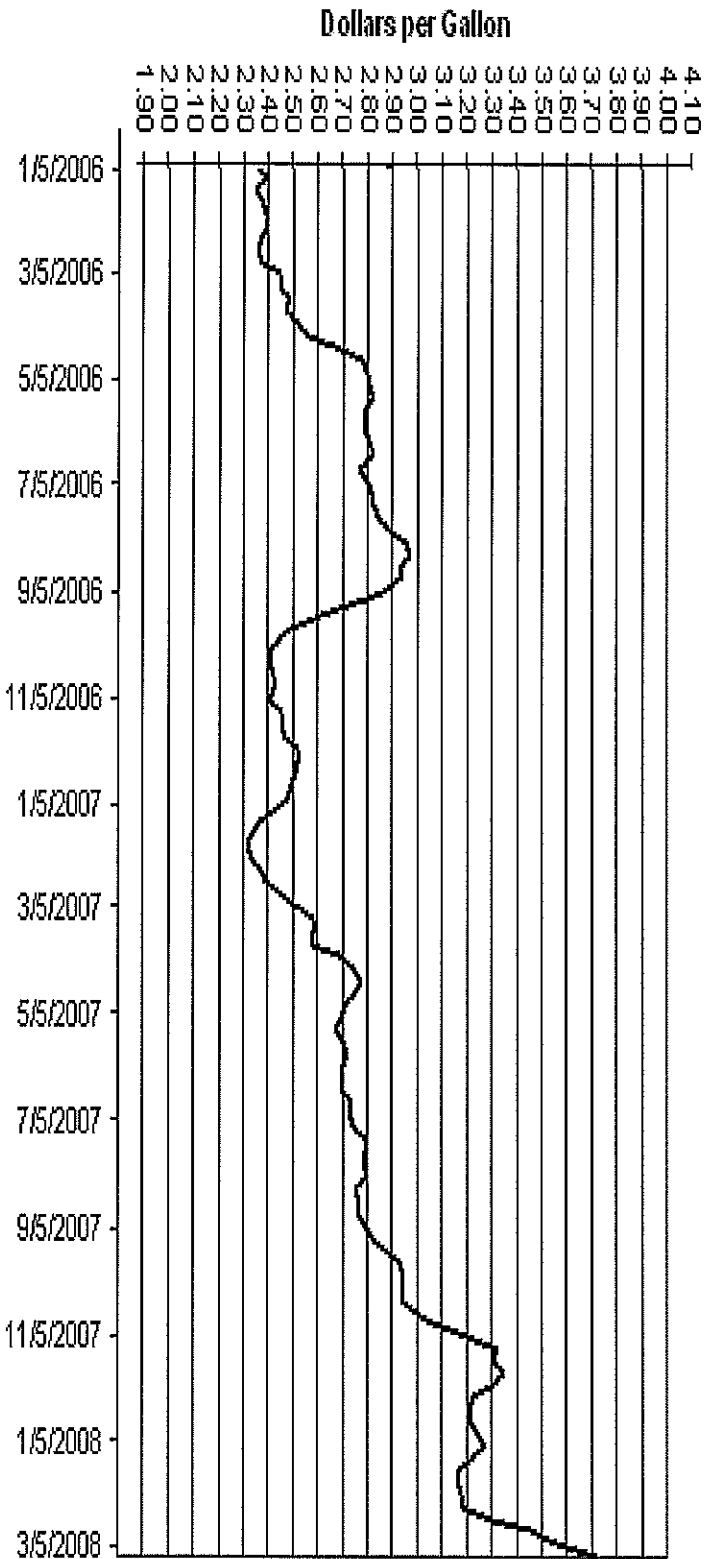
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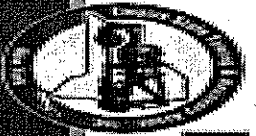
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Weekly U.S. Retail On-Highway Diesel Prices Average All Types



Source: Energy Information Administration



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***Behind the Fuel Increase**

- *Published by http://www.eia.doe.gov/emeu/steo/pub/contents.html#US_Petroleum_Markets.*

Prices. WTI crude oil prices, which averaged \$72.32 per barrel in 2007, are projected to average \$94.11 and \$85.92 per barrel, respectively, in 2008 and 2009. Regular grade gasoline retail prices, which averaged \$2.81 per gallon in 2007, are projected to average \$3.21 and \$3.06 per gallon, respectively, in 2008 and 2009. Diesel fuel prices, which averaged \$2.88 per gallon last year, are projected to average \$3.45 and \$3.22 per gallon, respectively, in 2008 and 2009. The monthly average gasoline price is projected to peak at just under \$3.50 per gallon this spring, while diesel prices are expected to average around \$3.70 per gallon in March and April.

Diesel prices are projected to show larger gains in 2008, averaging \$3.45 per gallon, or 57 cents above the 2007 average price. The monthly average gasoline price is projected to peak near \$3.50 per gallon this spring, while diesel prices are expected average close to \$3.70 per gallon for March and April.



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New York City Insurance Costs Per Unit

Insurance Rates Per Unit/Truck:

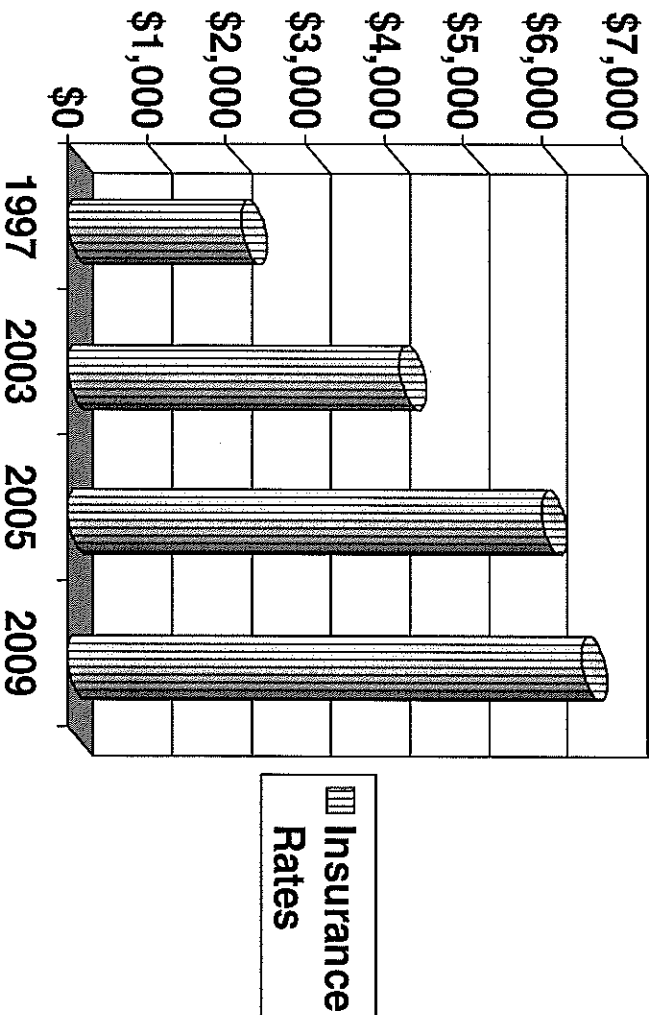
Includes: General liability, Cargo, Collision, Comp, Auto liability & Garage keepers

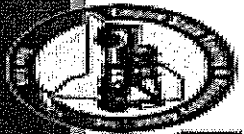
1997	\$2,000 to \$2,200
2000	\$2,800 to \$3,000
2005	\$5,500 to \$6,000
2009	\$6,000 to \$6,500

Difference: **Increase of 196%**

* Source: Steven Wright of Zurich Insurance

Average Insurance Rates Per Unit/Truck





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New York City Property Taxes

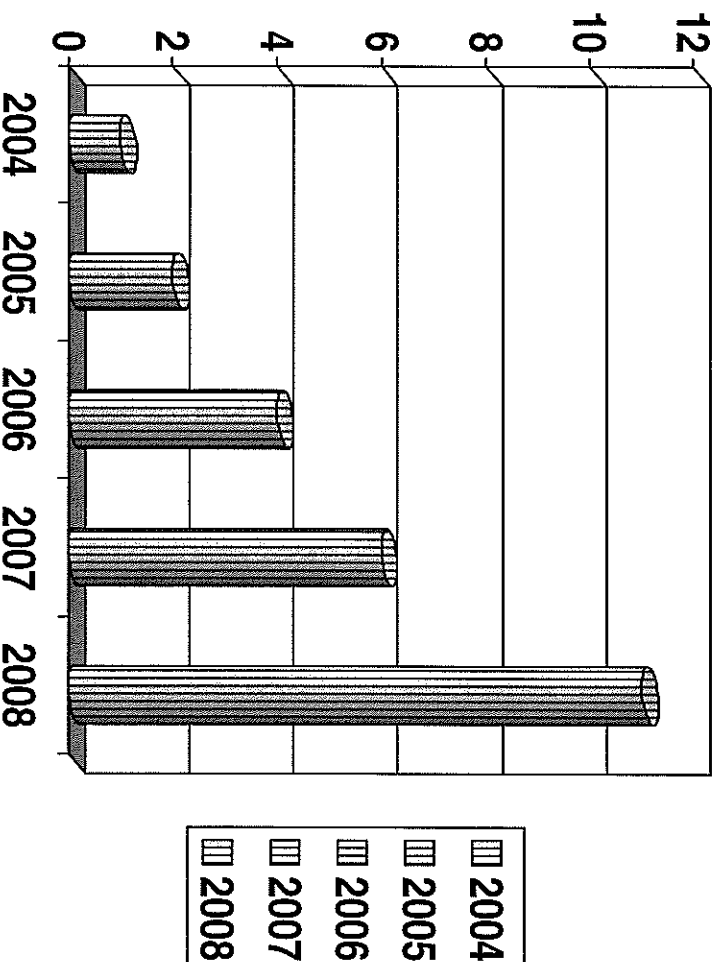
New York City Market Value Has Accelerated Propelled by Class One Appreciation.

The market value of taxable property increased 8.4% in 2008, propelled by 11% growth in value of Class One properties. Citywide market values \$354 Billion, \$27 Billion more than the previous year

Difference: **Increase of 48%**

Annual Growth Rate

* Source: nyc.gov/finance





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OTHER REGULATED TOW & STORAGE RATES

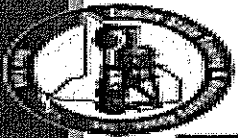
Other Regulated Tow Rates

San Francisco	\$220.00
Dallas	\$212.00
NYPD	\$185.00
NYC DOF	\$185.00
Oakland	\$180.00
Sacramento	\$165.00
Chicago	\$150.00
Baltimore	\$150.00
Houston	\$143.50
Los Angeles	\$140.00
Smithtown NY	\$125.00

Other Regulated Storage Rates

San Francisco	\$75.00
Oakland	\$65.00
Chicago	\$50.00

Information provided by the Towing & Recovery Association of America



Empire State Towing & Recovery Association

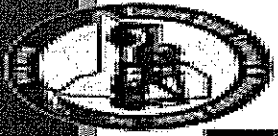
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Towing & Storage Proposal

In response to the items mentioned previously and our rising costs of fixed overhead, the Empire State Towing & Recovery Association asks the New York City Council to pass Intro 708a, that would adjust the regulated tow fees to be compensatory as is required by federal law.



Empire State Towing & Recovery Association

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We come before you today representing over 500 business's and the thousands of employees, thanking you for the time to consider our request and allow us to present it.

We believe the information presented in this proposal would justify the adjustment we have petitioned for and would be fair and reasonable as our industry is entitled too.



Empire State Towing & Recovery Association

'Dedicated to Professionalism'

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In closing we say:

Thank You

and as always we are available for your questions.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 708 A Res. No. _____

in favor in opposition

Date: 4-21-09

(PLEASE PRINT)
Name: Ralph Gowzler

Address: 24-24 142nd Ave Rosedale, NY, 11424

I represent: Big City Auto Body & Towing

Address: 37-24 13th St LIC, NY, 11101

**THE COUNCIL
THE CITY OF NEW YORK**

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in favor in opposition

Date: 4/21/09

(PLEASE PRINT)
Name: ANDREW EILER

Address: 42 BROADWAY

I represent: KNC DGA

Address: 42 BROADWAY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 708 A Res. No. _____

in favor in opposition

Date: 4/21/2009

(PLEASE PRINT)
Name: NORMAN TEITLER

Address: METROPOLITAN NY TOWING, Auto

I represent: BODY & SALVAGE ASSN.

Address: 252 Street Brooklyn

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 708-A Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)
Name: John Corlett + John Africans

Address: AAA New York

I represent: 1415 Kellum Place

Address: Garden City, NY 11530

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 708A Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)
Name: Joseph K. Kobles

Address: 120 Union Ave Bklyn NY 11206

I represent: Empire State Towing Assn

Address: 107 Washington Ave Albany NY
12210

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 708A Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)
Name: PERN B. O'CONNELL

Address: 107 WASHINGTON AVE ALBANY, NY 12210

I represent: EMPIRE STATE TOWING & RECOVERY ASS'N

Address: SAME

Please complete this card and return to the Sergeant-at-Arms